

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	<b>Chapter 13</b>
<b>WILLIAM EDWARD EHRET, JR.</b> , aka William	:	<b>Case No. 5:19-bk-00252</b>
Edward Ehret, aka William Ehret,	:	
aka William E. Ehret, aka William E. Ehret, Jr.,	:	
aka William Ehret, Jr., and	:	
<b>RENEE EHRET</b> , aka Renee R. Ehret,	:	
aka Renee Theresa Ehret,	:	
Debtors	:	

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<b>NATIONSTAR MORTGAGE, LLC</b> , dba Mr. Cooper	:	
Movant	:	<b>Motion for</b>
v.	:	<b>Relief from Stay</b>
<b>WILLIAM EDWARD EHRET, JR.</b> , aka William Edward	:	
Ehret, aka William Ehret, aka William E. Ehret,	:	
aka William E. Ehret, Jr., aka William Ehret, Jr., and	:	
<b>RENEE EHRET</b> , aka Renee R. Ehret, aka Renee Theresa	:	
Ehret, and	:	
<b>CHARLES J. DEHART, III, TRUSTEE</b> ,	:	
Respondents	:	

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**ANSWER TO MOTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
FOR RELIEF FROM STAY**

AND NOW COMES Debtors, **WILLIAM EDWARD EHRET, JR.** and **RENEE EHRET**, by and through their attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C., and in Answer to the Motion of **NATIONSTAR MORTGAGE, LLC, dba Mr. Cooper**, for Relief from Stay aver as follows:

1. Admitted.
2. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.
3. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments.

4. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments. To the extent the allegations of paragraph 4 refer to written documents, such as a promissory note, Debtors refer to those documents for the content thereof.

5. Denied. This paragraph represents a legal conclusion to which no response is necessary. To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

6. Admitted.

7. Admitted.

8. Debtors admit they have not made all post-petition payments.

9. Denied. Debtors submit the arrearage is \$2,037.34 (\$775.60 for May 2019 and \$1,261.74 for June 2019).

10. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments. To the extent the allegations of paragraph 10 refer to written documents, such as Debtors' schedules, Debtors refer to those documents for the content thereof.

11. Denied. This paragraph represents a legal conclusion to which no response is necessary. To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

12. Denied. This paragraph represents a legal conclusion to which no response is necessary. To the extent the Court determines there to be a factual averment in this paragraph requiring response it is specifically denied.

13. Denied. After reasonable investigation the Debtors are without knowledge sufficient to form a belief as to the truth of these averments. To the extent the allegations of paragraph 13 refer to written documents Debtors refer to those documents for the content thereof.

WHEREFORE, Debtors, **WILLIAM EDWARD EHRET, JR.** and **RENEE EHRET**, respectfully prays this Honorable Court for an Order that the Motion of **NATIONSTAR MORTGAGE, LLC, dba Mr. Cooper**, for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

**NEWMAN, WILLIAMS, MISHKIN,  
CORVELEYN, WOLFE & FARERI, P.C.**

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